

**SANTAMARIA AFFIDAVIT
EXHIBIT P
PLAINTIFF'S DEPOSITION
PP88-89**

1 JANKOUSKY

88

2 A If a banker gives a referral, they
3 can make, I think, a \$1.50 to \$3 per referral,
4 if I remember correctly.

5 Q What kind of referrals are you
6 referring to?

7 A Checking accounts or saving
8 accounts and I believe other products, I'm not
9 sure. I don't recall all, but, certainly,
10 checking or money market or saving accounts.

11 Q What was it that was fraudulent
12 that was going on?

13 MS. GOODELL: Objection to the form
14 of the question.

15 A The CSR or bankers were opening
16 accounts for clients that were normally
17 handled by another banker, and they counted
18 that as a referral.

19 Q So they were switching them back
20 and forth so they could get referral fees?

21 A That is what it looked like to me.

22 Q When did this come to your
23 attention?

24 A In the fall of 2000. I don't
25 remember the exact month, but in the fall or

1 JANKOUSKY

89

2 early winter of 2006.

3 Q How did it first come to your
4 attention that this activity was going on?

5 A Donna Hutchinson brought it to my
6 attention.

7 Q Who was she?

8 A Donna Hutchinson was one of my
9 assistant managers.

10 Q When Donna Hutchinson brought this
11 to your attention, what, if anything, occurred
12 as a result of that?

13 A We discussed what we needed to do
14 to handle this.

15 Q What was it, if anything, that was
16 determined needed to be done to handle this?

17 A We had two choices, either to give
18 them a written warning or a verbal warning,
19 and we decided to give them a verbal warning.

20 Q Were there any other consequences
21 as a result of this activity other than a
22 written or verbal warning?

23 A They needed to be withdrawn from
24 the incentive compensation referral plan.

25 Q In connection with this